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E-Filed 3/19/2010

Attorneys for Defendant
COUNTY OF SANTA CLARA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SANTA CLARA COUNTY) No. C09-6066-JF PVT
PROBATION PEACE OFFICERS')
UNION, AFSCME, LOCAL 1587 and) STIPULATION AND {PROPOSED}
SALVADOR MORA,) ORDER CONTINUING CASE
Plaintiff,) MANAGEMENT CONFERENCE FROM
v.) APRIL 23, 2010 TO JUNE 11, 2010
COUNTY OF SANTA CLARA,)
SHEILA MITCHELL, as Chief Probation)
Officer)
Defendant.)

1. The first Case Management Conference (“CMC”) is current set for April 23, 2010.

2. The parties, through their respective counsel of record, are actively exploring possible settlement. In order to complete settlement discussions, the parties hereby stipulate to continue the initial CMC for a period of approximately 45 days, or until June 11, 2010.

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1 3. All other dates applicable to filings required prior to the initial CMC
2 conference are also extended by 45 days, including the time period for Defendants to file
3 an Answer.

4 IT IS SO STIPULATED:

5 Dated: March 11, 2010

By: /s/ Louis D. Silver

LOUIS D. SILVER
SILVER & KATZ
Attorneys for Plaintiff

8 Dated: March 10, 2010

By: /s/ Jonathan Jackel

JONATHAN JACKEL
ROUSSO & JACKEL, INC.
Attorneys for Plaintiff

11 Dated: March 16, 2010

By: /s/ Nancy J. Clark

NANCY J. CLARK
Deputy County Counsel
Attorneys for Defendants
COUNTY OF SANTA CLARA

14 **ORDER**

15 The Case Management Conference presently scheduled for APRIL 23, 2010 is
16 vacated and a Case Management Conference is set for **JUNE 11, 2010 at 10:30 a.m.**
17 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19 Dated: 3/18/2010, 2010

20 
21 JEREMY FOGEL
United States District Court Judge

23 **I hereby attest that I have on file all holograph signatures for any signatures
24 indicated by a "conformed" signature (/S/) within this efiled document.**

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PROOF OF SERVICE BY MAIL

Santa Clara County Probation Peace Officers' Union vs. County of Santa Clara C09-06066 JF PVT

I, Nancy D. Fenton, say:

I am now and at all times herein mentioned have been over the age of eighteen years, employed in Santa Clara County, California, and not a party to the within action or cause; that my business address is 373 West Julian Street, Suite 300, San Jose, California 95110-2335. I am readily familiar with the County's business practice for collection and processing of correspondence for mailing with the United States Postal Service. I served a copy of the

**STIPULATION AND [PROPOSED] ORDER CONTINUING CASE
MANAGEMENT CONFERENCE FROM APRIL 23, 2010 TO JUNE 11, 2010**

by placing said copy in an envelope addressed to:

LOUIS D. SILVER
SILVER & KATZ
226 Airport Parkway, #650
San Jose, CA 95126

JONATHAN JACKEL
ROUSSO & JACKEL, INC.
116 E. Campbell Avenue, Suite 1
Campbell, CA 95008

which envelope was then sealed, with postage fully prepaid thereon, on March 16, 2010, and placed for collection and mailing at my place of business following ordinary business practices. Said correspondence will be deposited with the United States Postal Service at San Jose, California, on the above-referenced date in the ordinary course of business; there is delivery Service by United States mail at the place so addressed.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on March 16, 2010, at San Jose, California. /s/ NancyFenton

